

May 10 2016

UNITED STATES OF AMERICA **Electricity Delivery and**
BEFORE THE **Energy Reliability**
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY

SociVolta Inc.

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EA-433
Docket No. ER17-184-000

APPLICATION OF SOCIVOLTA INC
FOR AUTHORITY TO TRANSMIT ELECTRIC ENERGY TO CANADA

PUBLIC VERSION

Pursuant to Section 202(e) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(e) and 10 C.F.R. § 205.300, et seq., SociVolta Inc ("SociVolta" or "Applicant") hereby submits this application for a blanket authorization to export electricity from the United States to Canada ("Application"). SociVolta respectfully requests authorization to transmit electric energy from the United States to Canada for a period of five (5) years. SociVolta further respectfully requests that this application be made effective no later than February 1, 2017.

I. COMMUNICATIONS

Communications and correspondence concerning this filing should be addressed to:

Ruta Kalvaitis Skučas
Pierce Atwood LLC
1875 K St., NW Suite 700
Washington, DC 20006
Tel. (202) 530-6428
Fax. (202) 223-2239
rskucas@pierceatwood.com

II. DESCRIPTION OF APPLICANT

Applicant is a Canadian company incorporated in Montréal, Québec, Canada. [REDACTED]

[REDACTED] does not have any ownership interest or involvement in any other company that is a traditional utility or that owns, operates, or controls any electric generation, transmission or distribution facilities, nor do they have any direct involvement with the energy industry other than through the ownership of SociVolta.

SociVolta will be a FERC-authorized power marketer engaging in the purchase and sale of physical and/or virtual energy in the Day-ahead and Real-time Markets of the various Independent System Operators and Regional Transmission Organizations. SociVolta applied for market-based rate authority on October 26, 2016 in FERC Docket No. ER17-184-000. SociVolta will file an update to this application once FERC acts upon its market-based rate application.

III. JURISDICTION

SociVolta believes that the U.S. Department of Energy (“DOE”) is the only governmental agency that has jurisdiction over this application.

IV. DESCRIPTION OF TRANSMISSION FACILITIES

SociVolta intends to export electricity over existing international transmission facilities between Canada and the United States, as identified in Exhibit C. SociVolta requests authority to export electricity to Canada over any international transmission facility authorized by Presidential Permit that is appropriate for open access by third parties in accordance with the assessment made by DOE of the transmission limits for operation in the export mode.

V. TECHNICAL DISCUSSION OF PROPOSAL

Section 202(e) of the Federal Power Act (“FPA”) and DOE’s regulations provide that exports should be allowed unless the proposed export would impair the sufficiency of electric power supply within the United States or would tend to impede the coordinated use of the United States power supply network.¹ SociVolta seeks blanket authority to transmit electric power to Canada as a power marketer. SociVolta has no electric power supply system on which the proposed exports could have a reliability, fuel use system or stability impact. SociVolta also has no obligation to serve native load usually associated with a franchised service area, and, thus, the exports proposed by SociVolta will not impair its ability to meet current and prospective power supply obligations.

SociVolta will purchase power to be exported from a variety of sources such as power marketers, independent power producers, or U.S. electric utilities and federal power marketing entities as those terms are defined in Sections 3(22) and 3(19) of the FPA. By definition, such power is surplus to the system of the generator and, therefore, the electric power that SociVolta will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the U.S.²

SociVolta will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to schedule and deliver power exports. All of the electricity exported by SociVolta will be transmitted pursuant to arrangements with utilities that own and operate existing transmission facilities and will be consistent with the export limitations and other terms and conditions contained in the existing Presidential Permits and electricity

¹ 16 U.S.C. § 824a(e).

² See *Enron Power Marketing, Inc.*, Order EA-102 (1996).

export authorizations associated with these transmission facilities. SociVolta will schedule its transactions with the appropriate balancing authority areas in compliance with the reliability criteria standards and guidelines established by the North American Reliability Corporation (“NERC”) and its member Regional Entities in effect at the time of the export.

In previous orders granting export authorization to electric power marketers, DOE declined to rigidly apply the information filing requirements contained in its regulations and instead used a flexible approach which takes into consideration the unique nature of power marketers, the requirements of FERC Order No. 888 and previously authorized export limit of cross-border facilities.³ These same considerations demonstrate that the exports proposed by SociVolta will not impair or tend to impede the sufficiency of electric supplies in the U.S. or the regional coordination of electric utility planning or operations.

VI. COMPLIANCE WITH CONDITIONS AND PROCEDURES

SociVolta proposes to abide by the general conditions consistent with DOE’s previous grants of authorizations to power marketers as set forth in its previous orders, as described herein. From time to time, SociVolta will enter into agreements with third parties which involve the export of electric power from the United States into Canada. Exports made by SociVolta will not exceed the export limits for the facilities, or otherwise cause a violation of the terms and conditions set forth in the export authorizations for each. With regard to specific transactions, SociVolta will provide written evidence to DOE that it has secured sufficient transmission service for the delivery of power to the border. When scheduling the delivery of power,

³ See e.g. *NorAm Energy Services, Inc.*, Order No. EA-105-CN (Aug. 16, 1996); *MidCon Power Services Corp.*, Order No. EA-114 (July 15, 1996); *USGen Power Services*, No. EA-112 (June 27, 1996); *CNG Power Services Corp.*, Order No. EA-110 (June 20, 1996); *North American Energy Conservation, Inc.*, Order No. EA-103 (May 30, 1996).

SociVolta will comply with the applicable NERC reliability standards. For each calendar year, SociVolta will provide DOE with reports indicating the gross amount of electricity delivered to Canada, consideration received during each month, and the maximum hourly rate of transmission, as well as any additional annual reports.

VII. VERIFICATION, REQUIRED COPIES, AND FEE

Verification executed by SociVolta's authorized representative in accordance with 10 C.F.R. § 205.302(h) is enclosed with the Application. In accordance with the requirements of 10 C.F.R. § 205.307, and DOE's directions, five (5) copies of the Application are being provided to the Department. In accordance with the requirements of 10 C.F.R. § 205.309, a copy of this application will be provided to the Secretary of the Federal Energy Regulatory Commission.

A check in the amount of \$500.00 made payable to the Treasurer of the United States is enclosed in payment of the fee specified in 10 C.F.R. § 205.309.

VIII. REQUIRED EXHIBITS

The following information is provided pursuant to the required exhibits as set forth in DOE regulations 10 C.F.R. § 205.303:

Exhibit A	Transmission Agreements	Not Applicable
Exhibit B	Opinion of Counsel	Attached
Exhibit C	Transmission Facilities	List of international transmission facilities submitted in lieu of a map
Exhibit D	Designation of Agent	Attached
Exhibit E	Statement of Corporate Relationship	Not Applicable
Exhibit F	Operating Procedures	Not Applicable

Exhibit G

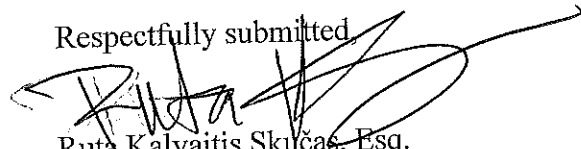
FERC Market Based Rate
Authority

Application filed on October 26, 2016 in
Docket No. ER17-184-000.

IX. CONCLUSION

WHEREFORE, SociVolta respectfully requests that DOE grant this application for blanket authorization to export power from the United States to Canada, for a period of five (5) years, with such authorization to be effective as of February 1, 2017.

Respectfully submitted,



Ruta Kalvaitis Skucas, Esq.

Pierce Atwood LLP

1875 K St. N.W., Suite 700

Washington, D.C. 20006

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Facsimile: (202) 223-2239

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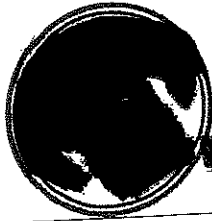
Attorney for SociVolta Inc.

November 10, 2016

VERIFICATION

I, [REDACTED], being authorized to execute this verification and having knowledge of the matters set forth in this Application of SociVolta Inc., hereby verify that the contents thereof are true and correct to the best of my knowledge and belief.

[REDACTED]



Name of Notary Public (*printed name*)

Notary Public

My commission expires:

EXHIBIT A – TRANSMISSION AGREEMENTS

SociVolta has not entered into any transmission agreements at this time.

EXHIBIT B – OPINION OF COUNSEL

November 10, 2016

Mr. Christopher Lawrence
Department of Energy
Office of Electricity Delivery and Energy Reliability
OE-20, Room 8G-024
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Application of SociVolta Inc. for Authorization to Export Electricity

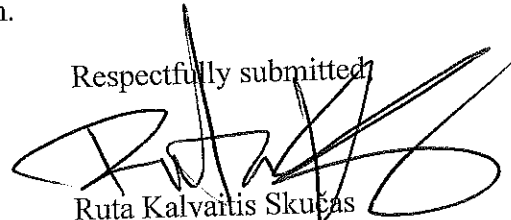
Dear Mr. Lawrence:

Pursuant to 10 C.F.R. § 205.303(b), I hereby provide a legal opinion regarding the corporate powers of SociVolta Inc. to export electricity to Canada. I have examined the Articles of Incorporation of SociVolta Inc.. Based on my review of those documents and representations provided to me by authorized representatives of SociVolta Inc., it is my opinion that:

1. The import and export of electricity contemplated by this Application is within the corporate powers of SociVolta Inc.; and
2. To the best of my knowledge and belief, SociVolta Inc. has directed its officers and agents to take all necessary steps to comply with all applicable state and federal laws in connection with the actions to be taken under the Application.

I am opining here only as to the federal laws of the United States, and laws of relevant states within the United States. I express no opinion as to the laws of any other jurisdiction. I am not assuming any obligation to review or update this opinion should the law or existing facts or circumstances change. This opinion is provided by me as counsel to SociVolta Inc. solely to you for your exclusive use and is not to be made available or relied upon by any other person or entity without my prior written authorization.

Respectfully submitted,



Ruta Kalvaitis Skučas

Counsel for SociVolta Inc.

EXHIBIT C – INTERNATIONAL TRANSMISSION FACILITIES

At the U.S.-Canada Border
Authorized for Use by Third Party Transmitters

Present Owner	Location	Voltage	Presidential Permit No.
Bangor Hydro Electric Co.	Baileyville, ME	345 kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230 kV	PP-64
Bonneville Power Administration	Blaine, WA	2x 500 kV	PP-10
	Nelway, WA	230 kV	PP-36
	Nelway, WA	230 kV	PP-46
Eastern Maine Electric Cooperative	Calais, ME	69 kV	PP-32
International Transmission Co.	Detroit, MI	230 kV	PP-230
	Marysville, MI	230 kV	PP-230
	St. Claire, MI	230 kV	PP-230
	St. Claire, MI	345 kV	PP-230
Joint Owners of the Highgate Project	Highgate, VT	120 kV	PP-82
Long Sault, Inc.	Massena, NY	2x 115 kV	PP-24
Maine Electric Power Co.	Houlton, ME	345 kV	PP-43
Maine Public Service Co.	Limestone, ME	69 kV	PP-12
	Fort Fairfield, ME	69 kV	PP-12
	Madawaska, ME	138 kV	PP-29
	Aroostook, ME	2x 69 kV	PP-29
Minnesota Power Inc.	International Falls, MN	115 kV	PP-78
Minnkota Power Cooperative	Roseau County, MN	230 kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230 kV	PP-305 ⁴

⁴ These transmission facilities have been authorized but not yet constructed or placed into operation

Present Owner	Location	Voltage	Presidential Permit No.
New York Power Authority	Massena, NY	765 kV	PP-56
	Massena, NY	2x 230 kV	PP-25
	Niagara Falls, NY	2x 345 kV	PP-74
	Devil's Hole, NY	230 kV	PP-30
Niagara Mohawk Power Corp.	Devil's Hole, NY	230 kV	PP-190
Northern States Power Co.	Red River, ND	230 kV	PP-45
	Roseau County, MN	500 kV	PP-63
	Rugby, ND	230 kV	PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	±450 kV	PP-299 ⁵
Vermont Electric Power Co.	Derby Line, VT	120 kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450 kV DC	PP-76
	Millbury, MA	345 kV	
	Medway, MA	345 kV	

⁵ These transmission facilities have been authorized but not yet constructed or placed into operation

EXHIBIT D – DESIGNATION OF AGENT AND POWER OF ATTORNEY

**IRREVOCABLE LIMITED
POWER OF ATTORNEY**

This IRREVOCABLE LIMITED POWER OF ATTORNEY is made on November 8, 2016 by SociVolta Inc. (the "Principal"), a corporation organized and existing under the Canadian Business Corporations Act, with its headquarters at [REDACTED]

1. Appointment. The Principal hereby appoints Ruta Kalvaitis Skučas, Esq., with principal place of business at Pierce Atwood LLP, 1875 19th St N.W, Suite 700, Washington, D.C. 20006, as the Principal's true and lawful agent for the limited purpose set forth below.

2. Scope of Authority. Pursuant to 10 C.F.R. § 205.303(d), Attorney Skucas shall have the limited power and authority to serve as the agent for the Principal regarding all matters related to the Principal's authorization to export electricity to Canada as issued by the U.S. Department of Energy ("DOE"). This appointment will remain in effect for the duration of the authorization, a five-year period, and will terminate simultaneously with the expiration of the authorization granted by DOE.

3. Irrevocability. This Power of Attorney is irrevocable by the Principal.

IN WITNESS HEREOF, the Principal has caused this Power of Attorney to be duly executed on this 8 day of November, 2016.

By [REDACTED]

SUBSCRIBED AND SWORN BEFORE ME, this 8th day of November, 2016.

[REDACTED]
Name of [REDACTED] (Printed name)
Notary Public [REDACTED]
My commission expires [REDACTED]

**EXHIBIT E – STATEMENT OF ANY CORPORATE RELATIONSHIP
OR EXISTING CONTRACT**

Not Applicable

EXHIBIT F – OPERATING PROCEDURES

Not Applicable

EXHIBIT G – FERC MARKET BASED RATE AUTHORITY

Application filed with FERC for Market-Based Rate Authority

Dated October 26, 2016

Docket No. ER17-184-000